

August 2, 1976

Mr. Anthony Miceli
The City of Pensacola
Gas Division
P.O. Box 12910
Pensacola, Florida 32521

Dear Mr. Miceli:

This responds to your letter to Mr. Fulton of this Office dated April 16, 1976, in which you state:

"In reference to OPSO Advisory Bulletin Number 76-2; 49 CFR 192.457(b) and 192.465(e) Electrical Survey, we would appreciate an interpretation from your office as to what determines a hardship case; would economics as a factor be accepted as a hardship case, please explain?"

"We also would accept your interpretation as what is meant by 'Trouble' or 'Expense,' when referred to as incapable of performing an electrical survey."

The interpretation to which you refer is restated in the enclosed notice to clarify that the terms "hardship," "trouble," and "expense" refer to conducting an electrical survey on a particular pipeline and not to an operator's financial condition. Any finding with respect to an operator's inability to comply due to hardship, trouble, or expense would depend on the circumstances involved in a survey.

As you requested, we have added your name to our mailing list to receive copies of the Advisory Bulletin and copies of gas pipeline safety rulemaking documents.

Thank you for your interest in pipeline safety.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

CITY OF PENSACOLA, FLORIDA

April 16, 1976

Mr. Frank Fulton, Technical Director
Office Of Pipeline Safety Operations
Department Of Transportation
Material Transportation Bureau
Washington, D.C. 20590

Dear Mr. Fulton:

In reference to OPSO Advisory Bulletin Number 76-2; 49CFR 192.457(b) and 192.465(e) Electrical Survey, we would appreciate an interpretation from your office as to what determines a hardship case; would economics as a factor be accepted as a hardship case, please explain?

We also would accept your interpretation as what is meant by "Trouble" or "Expense", when referred to as incapable of performing an electrical survey.

I would be pleased to be placed on the mailing list for future Advisory Bulletins coming from your office, listed is the current address. Thank you.

Sincerely yours.

Anthony Miceli
Corrosion Engineer

Mr. Anthony Miceli
The City of Pensacola
Gas Division
Post Office Box 12910
Pensacola, Florida 32521